

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: : Bankruptcy No. 25-12567-DJB
Iris M. Ashley and Howard E. Ashley : Chapter 13
Debtor :
:
J.P. Morgan Chase Bank, NA as Successor by :
Merger to J.P. Morgan Mortgage Acquisition :
Corp. :
Movant :
vs. :
Iris M. Ashley and Howard E. Ashley :
Debtor/Respondent :
and :
Kenneth E. West, Esquire :
Trustee/Respondent :

OBJECTION TO CONFIRMATION OF THE PLAN

J.P. Morgan Chase Bank, NA as Successor by Merger to J.P. Morgan Mortgage Acquisition Corp. (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtors, Iris M. Ashley and Howard E. Ashley, Sr. (“Debtor”), as follows:

1. As of the bankruptcy filing date of June 25, 2025, Movant holds a secured Claim against the Debtor’s property located at 259 Highland Avenue, Wayne, PA 19087.

2. Movant is in the process of filing a Proof of Claim by the bar date, with an estimated secured claim in the amount of \$260,572.78, and estimated pre-petition arrears in the amount of \$25,458.75.

3. The Plan currently proposes payment to Movant in the amount of \$20,747.54 for pre-petition arrears.

4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).

5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 07/10/2025

/s/Danielle Boyle-Ebersole
Danielle Boyle-Ebersole, Esquire
Attorney I.D. # 81747
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<i>Debtor</i>	:	
J.P. Morgan Chase Bank, NA as Successor By	:	
Merger to J.P. Morgan Mortgage Acquisition	:	
Corp.	:	
<i>Movant</i>	:	
vs.	:	
Iris M. Ashley and Howard E. Ashley, Sr.	:	
<i>Debtor/Respondent</i>	:	
and	:	
Kenneth E. West, Esquire	:	
<i>Trustee/Respondent</i>	:	

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for J.P. Morgan Chase Bank, NA as Successor by Merger to J.P. Morgan Mortgage Acquisition Corp. (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on 07/10/2025:

Michael A. Cibik, Esquire
Via Electronic Filing
Attorney for Debtor

Kenneth E. West, Esquire
Via Electronic Filing
Trustee

Iris M. Ashley
Howard E. Ashley, Sr.
259 Highland Avenue
Wayne, PA 19087-4763
Via First Class Mail
Debtor

Respectfully Submitted,

Date: 07/10/2025

/s/Danielle Boyle-Ebersole
Danielle Boyle-Ebersole, Esquire
Attorney I.D. # 81747
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North Wales, PA 19454
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